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October 31, 2023

**BY ECF**

Hon. Victoria Reznik  
United States Magistrate Judge, SDNY  
300 Quarropas Street  
White Plains, New York 10601

**Re: United States v. Patel  
Defendant Hirenkumar Patel  
Docket # 23mj6797**

Dear Judge Reznik;

I write to request a modification of the bond conditions for my client, Hirenkumar Patel. On October 17, 2023, Your Honor ordered him released on the signatures of his brother Krupesh Patel and his wife Nishababen Patel. We have since learned that Krupesh would not be an acceptable suretor due to a prior conviction, of which we were unaware at the time of appearance.

We therefore respectfully request that the bond be modified by the substitution of his brother Vitul Patel in place of Krupesh, with all other conditions to remain in place. We propose to have Vitul appear in the Clerks office before the end of the week to sign the bond.

I have discussed this issue with AUSA Timothy Ly and AUSA ben Levander. The government has no objection, provided that Vitul is vetted by their office and is acceptable (something we have discussed and believe will be the case).

Thank you for your courtesy and consideration.

Respectfully yours,

*John S. Wallenstein*  
JOHN S. WALLENSTEIN

JSW/hs